

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

CLAUDIO COUTINHO, Individually and on  
behalf of all others similarly,

Plaintiff,

vs.

BRASKEM S.A., ROBERTO LOPES  
PONTES SIMOES, FERNANDO MUSA, and  
PEDRO VAN LANGENDONCK TEIXEIRA  
DE FREITAS,

Defendants.

Case No. 2:20-cv-11366-CCC-ESK

**STIPULATION AND ORDER APPOINTING  
CO-LEAD PLAINTIFFS AND CO-LEAD AND LOCAL COUNSEL**

WHEREAS, Claudio Coutinho (“Coutinho”) commenced this putative securities class action on August 25, 2020 on behalf of investors (the “Class”) that purchased Braskem S.A. (“Braskem”) ADSs between May 6, 2016, and July 8, 2020;

WHEREAS, on August 25, 2020, a notice of the action was issued pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), advising Braskem investors of an October 26, 2020 deadline to seek appointment as lead plaintiff;

WHEREAS, on October 26, 2020, lead plaintiff motions were filed by (1) Matsukawa Co. LLC (“Matsukawa”) (ECF No. 13); (2) Rogerio Basso (“Basso”)

(ECF No. 14); (3) Rainer Senn (“Senn”) (ECF No. 15); and (4) Claudio Coutinho (ECF No. 16) (collectively “Movants”);

WHEREAS, Basso and Coutinho filed notices of non-oppositions to the competing lead plaintiff motions on November 13, 2020 (ECF No. 17) and November 20, 2020 (ECF No. 19), respectively;

WHEREAS, Matsukawa and Senn (the only remaining Movants) recognize that they each have a significant financial interest in the recovery sought;

WHEREAS, after reviewing each other’s submissions, Matsukawa and Senn believe that it is in the proposed Class’ best interest to pool their experience and resources to litigate this action as Co-Lead Plaintiffs, with their respective counsel as Co-Lead Counsel;

WHEREAS, Matsukawa and Senn are committed to supervising the conduct of this litigation by their counsel and to ensuring that their counsel coordinate appropriately, prosecute the action efficiently, and avoid any duplication of effort in the conduct of the litigation;

THEREFORE, IT IS HEREBY STIPULATED that subject to the Court’s approval, Senn and Matsukawa agree to serve as Co-Lead Plaintiffs, Bernstein Liebhard LLP (“Bernstein Liebhard”) and Wolf Haldenstein Adler Freeman & Herz LLP (“Wolf Haldenstein”) agree to serve as Co-Lead Counsel for the proposed Class, and Schnader Harrison Segal & Lewis LLP (“Schnader Harrison”)

agrees to serve as Local Counsel for the proposed Class. Co-Lead Counsel and Local Counsel Schnader Harrison are referred to as “Counsel.”

**APPOINTMENT OF CO-LEAD  
PLAINTIFFS AND APPROVAL OF COUNSEL**

1. Having considered the provisions of Section 21D(a)(3)(B) of the PSLRA, 15 U.S.C. § 78u-4(a)(3)(B), the Court appoints Matsukawa and Senn as Co-Lead Plaintiffs to represent the interests of the proposed Class.

2. Pursuant to Section 21D(a)(3)(B)(v) of the PSLRA, 15 U.S.C. § 78u-4(a)(3)(B)(v), Matsukawa and Senn have selected Wolf Haldenstein and Bernstein Liebhard to serve as Co-Lead Counsel and Schnader Harrison as Local Counsel. The Court approves Bernstein Liebhard and Wolf Haldenstein as Co-Lead Counsel, and Schnader Harrison as Local Counsel, for the proposed Class.

3. Counsel’s responsibilities and duties include:

- a. to coordinate the preparation and filings of all pleadings;
- b. to coordinate the briefing and argument of any and all motions;
- c. to coordinate the conduct of any and all discovery proceedings;
- d. to coordinate the examination of any and all witnesses in depositions;
- e. to coordinate and direct the pretrial discovery proceedings and the preparation for trial and the trial of this matter, and to delegate work responsibilities to selected counsel as may be required;

f. to coordinate all settlement negotiations with counsel for defendants; and

g. to supervise all other matters concerning the prosecution or resolution of the claims asserted in the action.

Dated: November 23, 2020

SCHNADER HARRISON  
SEGAL & LEWIS, LLP

By: /s/ Lisa J. Rodriguez

Lisa J. Rodriguez

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*Local Counsel for the Class*

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*Co-Lead Counsel for the  
Class*

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*Co-Lead Counsel for the Class*

SO ORDERED:

DATED: 1/15/2021

A handwritten signature in black ink, appearing to read 'CC', is written above a horizontal line.

HONORABLE CLAIRE C. CECCHI  
UNITED STATES DISTRICT COURT JUDGE